

4/15/2021

Request for Discovery: Bruzzano, et al. v. Cole, Adv Case #20-8256

From: jpasquantonio@optonline.net,

To: jdaniels@jcdpc.com, easac@optonline.net, pristinecole1@aol.com, nbebirian@silvermanacampora.com,

Subject: Request for Discovery: Bruzzano, et al. v. Cole, Adv Case #20-8256

Date: Fri, Apr 9, 2021 4:11 pm

Dear Mr. Cole:

Please be reminded, and as discussed with Judge Scarcella on March 25, 2021 during the conference in the adversary, the Plaintiffs had no response to its e-mail request to you for discovery and therefore formally requested discovery in writing to you on March 6, 2021. The discovery is due within 30 days of service and to date we have still not received any response from you.

Sincerely,

Jennifer A. Pasquantonio, Esq.

Co-Counsel for Joint Plaintiffs

Jennifer A. Pasquantonio, Esq.

201 Wolfs Lane

Pelham, NY 10803

Tel. # (914) 632-6990

Fax # (914) 632-8560

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4/15/2021

Re: Request for Discovery: Bruzzano, et al. v. Cole, Adv Case #20-8256

From: pristinecole1@aol.com,
To: jpasquantonio@optonline.net, easac@optonline.net, nbebirian@silvermanacampora.com,
Bcc: mja@alberlaw.com,
Subject: Re: Request for Discovery: Bruzzano, et al. v. Cole, Adv Case #20-8256
Date: Fri, Apr 9, 2021 5:24 pm

I am in process of hiring counsel and you will have all the answers you need and the some. He gets back into the country on the 14th and will be looking forward to meeting you all and discussing all motions on both sides of the case.

—Original Message—

From: kroleski <jpasquantonio@optonline.net>
To: jdaniels@jcdpc.com; easac@optonline.net; pristinecole1@aol.com; nbebirian@silvermanacampora.com
Sent: Fri, Apr 9, 2021 4:11 pm
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To: pristinecole1@aol.com, easac@optonline.net, nbebirian@silvermanacampora.com,

Subject: Re: Request for Discovery: Bruzzano, et al. v. Cole, Adv Case #20-8256

Date: Wed, Apr 14, 2021 1:40 pm

Attachments: Cole discovery ltr.pdf (516K)

Dear Mr. Cole:

Please find attached a letter in reply to your email holding you in default for failure to comply with Plaintiff's request for discovery.

The hard copy of the letter has been mailed to you.

Sincerely,

Jennifer A. Pasquantonio, Esq.

Co-Counsel for Joint Plaintiffs

On April 9, 2021 at 5:24 PM Clifton Cole <pristinecole1@aol.com> wrote:

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JENNIFER A. PASQUANTONIO

ATTORNEY AT LAW

201 WOLFS LANE

PELHAM, NEW YORK 10803

TEL: (914) 632-6990

FAX: (914) 632-8560

April 14, 2021

Clifton Cole
1917 Avalon Pines Drive
Coram, NY 11727

By: E-mail and 1st Class Mail

Re: Bruzzano, et al. v. Clifton Cole, Defendant-Debtor
Ch. 7 Case #819-77656-845 (las) Adv. Proc. #8-20-08256

Dear Mr. Cole:

Please be advised that an e-mail reminder was sent to you on April 9, 2021 wherein you were advised that we had not received the responses to the Plaintiff's First Set of Document Requests that was served on March 6, 2021 and the discovery was due within 30 days from service.

As Judge Scarcella reminded you during the conference held on March 25, 2021 you have decided to proceed pro se in this matter and are obligated to comply with discovery requests, discovery rules and the rules and orders of the Court. The Court's orders and instructions should be complied with even if you decide to retain counsel as you have indicated in your e-mail response.

The Plaintiffs are holding you in default of the Discovery Requests set forth above for your failure to comply.

Very truly yours,

Jennifer A. Pasquantonio
Co-Counsel for Plaintiffs and
On Behalf of Jeffrey C. Daniels, Esq.
and Eric A. Sackstein, Esq.

From: pristinecole1@aol.com,
To: jpasquantonio@optonline.net, easac@optonline.net, nbebirian@silvermanacampora.com,
Subject: Re: Request for Discovery: Bruzzano, et al. v. Cole, Adv Case #20-8256
Date: Thu, Apr 15, 2021 9:57 am

Please be advised as I had mentioned per Judge Scardella's recommendation I did hire an attorney as I mentioned in the previous email to all of the above parties my attorney returned from out of the country on a 14 hour flight yesterday and was a bit Jet lagged. He has been obtained and will be in touch with the courts shortly as he is reviewing the case.

Sincerely

Clifton Cole

-----Original Message-----

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